

**LAW OFFICES OF YOLANDA HUANG**

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Attorney for Plaintiffs

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO/OAKLAND DIVISION

**ALAMEDA COUNTY MALE PRISONERS**  
And Former Prisoners, DANIEL GONZALEZ,  
et al. on behalf of themselves and others similarly  
situated, as a Class, and Subclass,

**PLAINTIFFS,**

vs.

**ALAMEDA COUNTY SHERIFF'S  
OFFICE, et al,**

**DEFENDANTS**

No. 3:19-cv-07423 JSC

**DECLARATION OF YOLANDA  
HUANG IN SUPPORT OF  
PLAINTIFFS' ADMINISTRATIVE  
MOTION FOR CLARIFICATION OF  
THIS COURT'S ORDER RE:  
CERTIFICATION OF A RULE  
23(B)(2) CLASS (ECF 312)**

Hon. Jacqueline Scott Corley, Presiding

Trial Date:

I, Yolanda Huang, do declare and state:

1. I am an attorney at law duly licensed to practice before the United States District Court for the Northern District of California and am counsel for the Plaintiffs in this action. If sworn as a witness I could and would testify to my personal knowledge of the facts set forth herein.

2. I am also counsel for the Plaintiffs in the action entitled *Mohrbacher, et al. v. Alameda County Sheriff's Office*, et al., Case No. C-18-00050-JD, which is also pending in the United States District Court for the Northern District of California and which is assigned to Judge Donato. The *Mohrbacher* case is a class action brought on behalf of female inmates at the Santa Rita Jail.

3. On August 31, 2023, this Court issued its Order Re: Certification of a Rule 23(B)(2) Class. (ECF 312). For purposes of the accompanying Administrative Motion for Clarification, the pertinent portions of the Order are the following:

“Accordingly, the Court CERTIFIES a class under Rule 23(b)(2) of all *male* detainees who are now, or will in the future be, subjected to the following sanitation policies and practices of Santa Rita Jail:

1. The Jail’s policy requiring inmates to maintain the sanitation of their own cells and common areas, but failing to have a policy or practice which provides inmates with adequate sanitation supplies, or a policy for addressing inmates housed with those who cannot functionally maintain their own sanitation because of mental health issues, which impacts sanitation for all inmates within that congregate housing area.

2. The Jail’s policy of not providing bathrooms in the common areas, and inmates’ difficulties obtaining access to bathroom areas during POD or out-of-cell time. (ECF 312, pg. 1:19-27)(Emphasis added).

4. On February 5, 2021, Judge Donato issued an order in the *Mohrbacher, et al. v. Alameda County Sheriff's Office*, et al., C-18-00050-JD, stating that his Court “will handle all claims based on gender-specific allegations for female inmates.” A true and accurate copy of the Civil Minutes, ECF 184, from the *Mohrbacher* case, is attached hereto as Exhibit A and is incorporated by reference as though set forth in full herein.

5. It was understood that this Court, in the *Gonzalez* case, would be responsible for adjudicating all claims of female inmates at the Santa Rita Jail that were not gender-specific claims and which were claims otherwise falling within the ambit of this Court's class certification order. (Huang Decl.). That understanding was incorporated into the Plaintiffs' Fifth Amended Complaint, pg. 2:13-19, which is the operative complaint in this matter. (ECF 180).

6. The policies and practices at Santa Rita Jail with regard to sanitation do not distinguish between men and women inmates. These policies and practices regarding sanitation are not gender specific. The physical structure of the housing units are identical and are interchangeable for housing either men or women. The common areas of all housing units lack bathrooms and the housing units are not gender specific. For example, Housing Unit 21 is currently one-half male and half female. Male inmates are in Housing Unit 21, in pods D, E and F, and female inmates in Housing. Unit 21, pods A , B, and C. The supplies provided male and female inmates for purposes of sanitation are identical and not gender specific.

7. Accordingly, Plaintiffs respectfully request that the Court issue an Order stating that the Class Certification in this case applies to both male and female detainees at the Santa Rita Jail.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 22 day of September 2023, at Berkeley, California.

/s/ Yolanda Huang  
Yolanda Huang, Esq.

EXHIBIT A

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

Civil Minutes

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Date: February 4, 2021

Judge: Hon. James Donato

Time: 8 Minutes

Case No. **C-18-00050-JD**

Case Name **Mohrbacher et al v. Alameda County Sheriffs Office et al**

Attorney(s) for Plaintiff(s): Yolanda Huang

Attorney(s) for Defendant(s): Gregory B. Thomas/Lynn L. Krieger/Peter G. Bertling

Deputy Clerk: Lisa R. Clark

Court Reporter: Ruth Ekhaus

PROCEEDINGS

Status conference -- Held (via Zoom webinar)

NOTES AND ORDERS

The Court will handle all claims based on gender-specific allegations for female inmates.  
Plaintiffs will file by April 5, 2021, an amended complaint based solely on those allegations.